

Regional
Assessment
input

Dabbs, Paul

From: Yale.Carolyn@epamail.epa.gov
Sent: Friday, October 11, 2002 11:32 AM
To: Dabbs, Paul
Subject: first comments on regional assessments

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To: Paul Dabbs
From: Carolyn Yale, EPA, 415-972-3482

I'm passing along some initial thoughts on the regional assessment process discussed at the last AC meeting. Several major concerns are: (1) how to develop assessments that genuinely address the intent of the Machado bill, which (as I read it) emphasizes use of local options (reference to minimizing "the need to import water from other hydrologic regions"), including specific reference to retrieving currently unuseable sources; and (2) how to address interregional issues.

At the meeting I asked about using common assumptions, but that actually missed the mark of my concerns. I'm looking for some unifying structure in the procedures for doing the regional documentation so that we can intelligently make assessments and guide the regional planning. This includes forethought both as to what topics should be considered in "step 1" and what information will be needed for evaluation. Probably you folks are working on this already; I just didn't hear any real interest in covering these matters on October 3.

I believe some of the "common understandings" needed are:

- * How to address actions with interregional effects. This would include (but not be limited to) interregional water transfers and actions with interregional water quality effects (translating to effects on use in other regions). At a minimum we would need to elicit regional information which would allow disclosure and evaluation of these impacts.
- * Clarify expectations regarding how key regulatory issues will be handled. For example, what are expectations regarding ESA and CWA requirements and compliance? At a minimum, require that the regional efforts consider these matters and document their assumptions, to reduce information gaps in the evaluation phase.

We need a structured interregional dialog/work process (e.g., convened around some key interregional water use/impact issues and/or addressing some "factor" (as in Table 1) issues comprehensively, as suggested by Joe Lima).

As to steps towards the Machado vision, ... I don't have a ready solution, except to say that part of the evaluation of regional efforts needs to address degree of reliance on local options (documentation of options in place or planned, and expected cost) and expectations regarding development of supplies avoiding imports (and costs). [Of course, intraregional development of supplies is not without impacts within or, in some cases, outside the region, and this would need to be evaluated.]

If we can't find or don't want to single out a real example for the Machado bill, consider providing a "template," straw case, or guidelines for water planning to meet the Machado objectives. Considering the diversity of regional conditions, synthesis of what's been learned from individual cases into guidelines and possibly a general exemplar may make the most sense.

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